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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

In re:

ENSO STEEL COMPANY, LLC,

Debtor.

Chapter 7

Case No. 2:19-bk-14149-BKM

**WILLIAM R. HERRERA,
VIVIAN VENDRELL AND
AMALIA GONZALEZ RATO'S
JOINDER IN THE US
TRUSTEE'S OBJECTION TO
DEBTOR'S THIRD MOTION TO
EXTEND TIME TO FILE
SCHEDULES AND
STATEMENTS**

Creditors William R. Herrera, Vivian Vendrell, and Amalia Gonzalez Rato (“Creditors”), by and through their undersigned attorneys, hereby file their Joinder in the United States Trustee’s December 31, 2019 Objection to Debtor’s Third Motion to Extend Time to File Schedules and Statement of Financial Affairs (Dkt. #26) (“Objection”). The substance of this Joinder is set out below.

As Debtor’s Motion itself indicates, this is the Debtor’s **third** request to extend the deadline to file its Schedules and Statement of Financial Affairs in this chapter 7 case. Debtor filed its first motion to extend on November 20, 2019 (Dkt #14). That motion was granted. Debtor filed its second motion to extend on December 2, 2019 (Dkt # 18). That

1 second motion was also granted. And this current third motion to extend was filed on
2 December 30, 2019 (Dkt #24).

3 Each of the three motions indicate that Debtor's principal, Robert Hunt, is
4 experiencing medical difficulties that prevent him from meeting with his counsel to finalize
5 and file the Schedules and Statements. Creditors are sympathetic to Mr. Hunt's condition,
6 but are frustrated and concerned with the ongoing delays that these extensions are causing.
7 Creditors agree with the US Trustee's Objection and urge the Court to adopt the suggested
8 deadlines and consequences if the Debtor does not meet these final filing and 341 meeting
9 deadlines.

10 DATED this 2nd day of January, 2020.

11 JENNINGS, STROUSS & SALMON, P.L.C.

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13 By: /s/ Bradley J. Stevens

14 Bradley J. Stevens

15 Daniel J.F. Peabody

16 *Attorneys for William R. Herrera,*

17 *Viviane Vendrell and Amalia Gonzalez Rato*

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19 COPIES of the foregoing delivered this
20 2nd day of January, 2020, via the Court's
CM/ECF system on all parties requesting
notice.

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